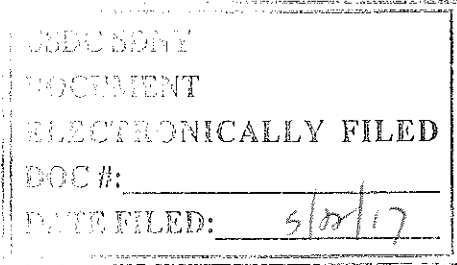




THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Zachary W. Carter
Corporation Counsel



BETH HOFFMAN
Senior Counsel
Phone: (212) 356-2372
Fax: (212) 356-3509
bhoffman@law.nyc.gov

MEMO ENDORSED

May 22, 2017

Via ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York

Re: Kelly et al. v. City of New York, et al, 15CV 00053

Your Honor:

OK
Colleen McMahon
5/22/17

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York representing defendants in the above-referenced action and write to request until June 16, 2017 to file a response to plaintiff's motion to amend the complaint and the Court's Order to Show Cause dated May 19, 2017 ("OTSC") until June 16, 2017¹. Defendants request this extension of time because they would like an opportunity to review plaintiff's response to the OTSC and they believe that many of issues raised by the Court in the OTSC are the same as what defendants will argue in their opposition to plaintiff's motion to amend. Moreover, defendants do not believe they can properly address the OTSC until they have reviewed plaintiff's submission. Given the holiday weekend and some other scheduling conflicts of the undersigned, defendants respectfully request until June 16, 2017 to serve and file their opposition to the motion to amend and any response to the OTSC.

¹ Defendants had originally written to the Court by letter dated late May 18, 2016, upon receipt of plaintiff's motion, to request an extension of time to respond to plaintiff's purported motion to amend. However, a review of the docket indicates that while the undersigned believed she had properly filed her May 18, 2017 letter, it appears that said letter never actually went through via ECF. I have attached a copy of this original letter as exhibit to this application. I apologize for any inconvenience this confusion may have caused the Court.

Thank you for your consideration of this matter.

Regards,

Beth Hoffman
Senior Counsel